

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:** \* **CASE 20-00633 EAG**  
**EFRAIN CARRERO VELEZ** \* **CHAPTER 7**  
**DEBTOR** \*

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**MOTION TO CONVERT TO CHAPTER 13**  
**TO THE HONORABLE COURT:**

Now comes debtor, through the undersigned attorney and very respectfully prays and very respectfully prays and states as follows:

1. This case was originally filed as a chapter 13 proceeding and converted to chapter 7. The conversion was due the fact that debtor was unable to demonstrate capacity to continue making child support payments.
2. Debtor attempted to gain control of the amount of \$156,000.00 that was deposited with the Superior Court of Puerto Rico, Mayaguez Section. Debtor's former spouse opposed said attempt. However, shortly after conversion to chapter 7 she agreed with the trustee precisely what she had opposed.
3. Debtor is now in a position to file a meaningful plan and continue making child support payments.

**WHEREFORE**, It is respectfully requested from this Honorable Court that this case be converted to chapter 13.

14 Days Notice: Within fourteen (14) days after the service as evidenced by the certification, and an additional three(3) days pursuant to Federal Rule of Bankruptcy Procedure 9906(f) if you served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's Office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i)the requested relief is forbidden by law;(ii) the requested relief is against public policy;(iii) in the opinion of the Court the interest of justice requires otherwise.

**CERTIFICATE OF SERVICE : I HEREBY CERTIFY:** That on April 5, 2021 we electronically filed the foregoing using the CM/ECF system. Notice of this filing will be sent electronically though the CM/ECF System to Chapter 7 Trustee, Roberto Román, US Trustee and Alejandro Oliveras, Chapter 13 Trustee and all parties in interest as per the attached list.

In Mayaguez, Puerto Rico, this 5th day of April, 2021.

*/s/Alberto O. Lozada Colón*

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104-2

Case 20-00633-EAG7

District of Puerto Rico

'once

on Apr 5 12:51:40 AST 2021

US Bankruptcy Court District of PR

Jose V Toledo Fed Bldg &amp; US Courthouse

100 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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